

REMARKS

Reconsideration and allowance of the subject application are respectfully requested. Applicants have carefully considered the Non-Final Office Action issued April 22, 2004 in the above-titled matter. Claims 25-43 have been canceled without prejudice or disclaimer. Applicants reserve the right to pursue these claims in continuing applications. Claims 1-13, 16-18 and 22-24 are pending.

Applicants respectfully request a one-month extension of time for responding to the outstanding office Action. The time for response is thus extended up to and including January 20, 2000. Please charge the associated Petition fee for small-entity of \$55, as well as any other fees that may be necessary, to Deposit Account No. 19-0733.

Claims 25-43 were rejected under 35 U.S.C. 112, first paragraph for allegedly failing to disclose in the specification a finite state process "comprising examining each character of a token to obtain a determination that the identified element is a source placeable element". Claims 25-43 were rejected under 35 U.S.C. 112, second paragraph for similar reasons. However, the specification discloses at page 12 that the determination of a placeable "may be accomplished using a finite state process that examines each character of a token one at a time until a determination is reached." Therefore, withdrawal of the rejections is respectfully requested.

Claims 1, 5, 7, 8, 10-13, 17, 18, and 24 were rejected under 35 U.S.C. 103(a) as being unpatentable over Carbonell et al (WO 94/06086) in view of Lakritz (U.S. Pat No. 6,623,529). This rejection is respectfully traversed.

The Office Action admits that Carbonell fails to teach or suggest identifying an element as a source placeable element by predetermined criteria based on the content of the element according to a rule-based query but relies on Lakritz to make up for the deficits of Carbonell. However, Lakritz also fails to teach or suggest identifying an element as a source placeable element by predetermined criteria based on the content of the element according to a rule-based query.

Lakritz discloses a parser that “uses a rules-based approach to identify *translatable* text in an HTML document” (emphasis added, col. 7, lines 28-29). Claim 1 recites identifying a “source placeable element” according to a rule-based query. The source placeable element is *not to be translated* whereas the text identified in Lakritz is identified as *translatable*. There would be no motivation to one of ordinary skill in the art to apply a method of finding *translatable* text to a method of identifying *non-translatable* text.

Likewise, in Carbonell, SGML tags are used to “shield units that will not be translated” (page 17, lines 8-9). Hence, Carbonell specifically uses SGML tags to label text that is *NOT* to be translated. Lakritz discloses a “rules-based approach to identify *translatable* text”. There would be no motivation to one of ordinary skill in the art to combine Carbonell’s disclosure of using SGML tags to label text as *NOT* being translatable with Lakritz’s disclosure of using a rules-based approach to find text that is translatable.

The Office Action asserts that it would have been obvious “to incorporate into Carbonell’s system the rule parser as taught by Lakritz because it would provide [the

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capability] of identifying translatable text with a high degree of accuracy.” (Office Action, page 4). Even assuming *arguendo* that this is correct, the motivation to combine the references asserted by the Office Action indicates the motivation would be to identify *translatable* text accurately. There is no teaching or suggestion in Carbonell to identify translatable text (Carbonell only discloses identifying SGML tags as indicating *non-translatable* text). Also, claim 1 recites identifying a source placeable element and does not recite identifying translatable text.

Hence, as set forth above, there is no motivation to combine Carbonell and Lakritz because each reference discloses an opposite teaching (translatable vs. non-translatable text). However, even if one were to combine the references, one would not achieve the claim 1 invention because the rules-based method of Lakritz is used only to identify translatable text. Claim 1 does not recite identifying translatable text.

Therefore, claim 1 is allowable over the cited art. The rejection should be withdrawn.

Claims 17, 18, and 24 are similar to claim 1 and are allowable for at least the reasons set forth above for claim 1.

Claims 5, 7, 8, 10-13 depend from claim 1 are allowable for at least the reasons set forth above for claim 1.

Claims 2-4, 6 and 9 were rejected under 35 U.S.C. 103(a) as being unpatentable over Carbonell in view of Lakritz and further in view of Murrow et al (EPO 0668558). This rejection is respectfully traversed.

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Claims 2-4, 6 and 9 depend from claim 1. As noted above, Carbonell and Lakritz, either alone or in combination, fails to teach or suggest claim 1. The Office Action asserts that Murrow discloses the localization of a computer program at col. 1, line 1- col. 2, line 37 and col. 8, line 13-30; applying a source placeable identifier to determine a type of source language (col. 17, lines 1-35); determining a target locale; applying the source locale (col. 9, line 18 – col. 10, line 14); and determining the placeable is a date (col. 17, line 1-35. Even assuming *arguendo* that these assertions are correct, Murrow fails to teach or suggest identifying an element as a source placeable element by predetermined criteria based on the content of the element according to a rule-based query. Nor does the Office Action assert that Murrow does provide this teaching.

Because Carbonell, Lakritz and Murrow, either alone or in combination, do not teach or suggest claims 2-4, 6 or 9, the rejection should be withdrawn.

Claims 22-23 were rejected under 35 U.S.C. 103(a) as being unpatentable over Carbonell in view of Lakritz and further in view of Beauregard (U.S. Pat. No. 5,974,413). This rejection is respectfully traversed.

Claims 22-23 depend from claim 1. As noted above, Carbonell and Lakritz, either alone or in combination, fails to teach or suggest claim 1. The Office Action asserts that Beauregard currency conversion and date transformations. Even assuming *arguendo* that this assertion is correct, Beauregard fails to teach or suggest identifying an element as a source placeable element by predetermined criteria based on the content of the element according to a rule-based query. Nor does the Office Action assert that Beauregard does provide this teaching.

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Because Carbonell, Lakritz and Beauregard, either alone or in combination, do not teach or suggest claims 2-4, 6 or 9, the rejection should be withdrawn.

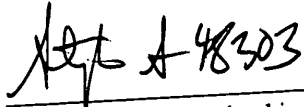
Claims 15-24 were rejected "under the same rationale" as claims 1-13 and 16. Claims 15 and 19-21 were previously canceled. Claim 16 depends from claim 1 and is allowable for at least the reasons set forth above for claim 1. Claims 17, 18, 22 and 23 were addressed above. Claim 24 is similar to claim 1 and is allowable for at least the reasons set forth above for claim 1.

Claims 25-43 were rejected under 35 U.S.C. 103(a) as being unpatentable over Carbonell in view of Ravin (U.S. Pat. No. 5,819,265). Claims 25-43 have been canceled. Therefore, the rejection is moot.

In view of the above, it is respectfully submitted that the application is in condition for allowance. Reconsideration and prompt allowance are respectfully requested. If the Examiner feels that a telephone interview would be helpful in facilitating prosecution of the case, the Examiner is respectfully requested to contact the undersigned attorney of record to discuss the application.

Respectfully submitted,

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